

REMARKS

Claims 1-15 are pending in the application. Claims 1 and 14 are independent. The Examiner has indicated that claims 2 and 9-11 as containing allowable subject matter.

Claims 1, 3, 6, 7, and 12-14 stand rejected under 35 U.S.C. §103(a) as obvious over Gullman et al.

Claim 1 has been amended to include display means for displaying complex images and has been amended to state that the means for selecting a complex image is means for selecting from the images displayed. Method claim 14 has been similarly amended.

The only display means in Gullman et al. is a 7-10 character LCD which is incapable of displaying complex images. This underlines the fact that the Gullman et al. device is completely different from the device claimed. There are no complex images and there is no selection of complex images by the user. In the present invention, the user sees a plurality of complex images displayed and chooses from among them in order to gain access to the system. In Gullman et al., the user gains access to the system by inputting his own biometric information, e.g. finger print into a security apparatus 14. The Gullman et al. device then compares the input information to one or more templates and

if a match is found, displays a token on the LCD display 20. The user enters the token using the keypad of the access device 12. The user never sees any kind of image and never selects anything.

Claim 4 stands rejected under 35 U.S.C. §103(a) as obvious over Gullman et al. in view of Davies. The arguments made above regarding claims 1 and 14 apply to claim 4 as well. The Applicant also stands by the arguments made in the previous amendments.

Claims 5, 8, and 15 stand rejected under 35 U.S.C. §103(a) as obvious over Gullman et al. in view of Gilchrist et al. These dependent claims are allowable for the same reasons as described above with reference to claims 1 and 14. The Applicant also stands by the arguments made in the previous amendments.

New claims 16-30 have been added. These claims are similar to the amended claims in that they refer to visual images. Gullman et al. clearly does not suggest the use of selectable visual images as a means for obtaining access to a computer system.

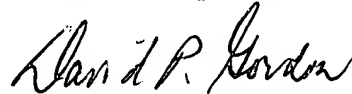
It should be noted by the Examiner that the Gullman et al. and Gilchrist et al. references relate to biometric identification of a user by a trusted client device. The present invention does not require that client device be trusted or even known. In the

present invention, the user is not identified by the client device; the user is identified by the host device. In the present invention, the user's authentication secret is not stored on the client device.

The Davies reference does not relate to biometric identification and thus is not appropriately combined with either the Gullman et al. or the Gilchrist et al. reference. The Examiner's stated incentive for combining these references is clearly based on hindsight.

In light of all of the above, it is submitted that all of the claims are in order for allowance, and prompt allowance is earnestly requested. Should any issues remain outstanding, the Examiner is invited to call the undersigned attorney of record so that the case may proceed expeditiously to allowance.

Respectfully submitted,



David P. Gordon
Reg. #29,996
Attorney for Applicant(s)

GORDON & JACOBSON, P.C.
65 Woods End Road
Stamford, CT 06905
(203) 329-1160

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